

IN THE UNITED STATES
DISTRICT COURT FOR THE
DISTRICT OF PUERTO RICO

In re:

**THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,**

as representative
of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors¹

PROMESA

Title III

No. 17 BK 3283-LTS

Re: ECF No. 21738

(Jointly Administered)

**URGENT CONSENSUAL MOTION FOR EXTENSION OF DEADLINE
TO REPLY TO DEBTOR'S OBJECTION TO CLAIM AND TO
RESCHEDULE HEARING DATE**

**TO THE HONORABLE UNITED STATES DISTRICT COURT
JUDGE LAURA TAYLOR SWAIN:**

COMES NOW, ROCKET LEARNING LLC, through the undersigned counsel to respectfully request an extension of the deadline for creditors to reply to the **FOUR HUNDRED EIGHTY-EIGHTH OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF THE**

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567- LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

COMMONWEALTH OF PUERTO RICO, THE EMPLOYEES' RETIREMENT SYSTEM OF THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO, AND THE PUERTO RICO PUBLIC BUILDINGS AUTHORITY TO DEFICIENT CLAIMS, filed on August 5, 2022 ECF No. 21738.

The appearing creditor respectfully prays for an order granting the relief requested.

Background

1. The Debtor filed the *Four Hundred Eighty-Eighth Omnibus Objection (Non-Substantive) Of The Commonwealth Of Puerto Rico, The Employees' Retirement System Of The Government Of The Commonwealth Of Puerto Rico, And The Puerto Rico Public Buildings Authority To Deficient Claims* on August 5, 2022.
2. The scheduled dates for this matter are September 5, 2022 at 4:00PM (Atlantic Standard Time) for the response deadline and September 21, 2022 at 9:30AM (Atlantic Standard Time) for the hearing.
3. Claim number 115471 filed by Rocket Learning, LLC. is one of the objected claims. Although the claim includes documents to support the asserted liability, the Debtor is requesting additional supporting documents to validate the claim.

Request for Relief

4. Therefore, this Urgent Motion seeks a thirty (30) day extension to pursue a good-faith and consensual resolution of the objection to claim 11547 and narrow the issues to prevent unnecessary litigation.
5. The creditor will continue to search to obtain additional supporting documents

once the Debtor specifies the requirements it seeks to validate the claim.

6. This extension is filed with the consent of the Financial Oversight and Management Board for Puerto Rico, (“the FOMB”)². Counsel Gabriel Miranda of O’Neill & Borges LLC has conveyed the FOMB’s consent to a thirty (30) day extension of time to respond to the *FOUR HUNDRED EIGHTY-EIGHTH OMNIBUS OBJECTION TO CLAIMS (NON-SUBSTANTIVE)* filed at ECF No. 21738.
7. The FOMB also agreed to adjourn the hearing scheduled for *FOUR HUNDRED EIGHTY-EIGHTH OMNIBUS OBJECTION (NON-SUBSTANTIVE)* to a later omnibus hearing date.
8. Upon the representations made by counsel Miranda, and the good faith communication between counsel for the Debtor and for the creditor, no opposition to this Urgent Motion is anticipated.
9. Because of the consent by the FOMB, the appearing creditor suggests these dates:
 - a. The deadline to respond to the Objection to claim Motion shall be extended to October 5, 2022.
 - b. The deadline for Movants to file a reply to an opposition shall be extended to October 20, 2022.

² The FOMB is the representative of the Commonwealth of Puerto Rico acting as said Debtor’s sole Title III representative pursuant to section 315(b) of the Puerto Rico Oversight, Management, and Economic Stability Act (“PROMESA”).

c. The hearing date suggested by the creditor is December 14, 2022.

WHEREFORE, Rocket Learning LLC respectfully prays for the Court to grant this motion and enter the Proposed Order and grant such other relief as is just and proper.

I HEREBY CERTIFY a copy of this notice of appearance was filed with the Clerk of the Bankruptcy Court for the District of Puerto Rico using the CM/ECF system, which will serve notice and copy of this filing to all registered participants.

Notice

Notice of this Urgent Motion in compliance with the Case Management Procedures has been sent to all the standard parties (a) the Office of the United States Trustee for the District of Puerto Rico; (b) the entities on the list of creditors holding the 20 largest unsecured claims (c) counsel to the statutory committees appointed in these Title III cases; (d) counsel to the Oversight Board; (e) counsel for AFAF (f) and, (g) all parties that have filed a notice of appearance in these Title III cases.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on September 2, 2022.

/S/ M^a Mercedes Figueroa y Morgade
M^aMERCEDES FIGUEROA Y MORGADE
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PROPOSED ORDER

IN THE UNITED STATES
DISTRICT COURT FOR THE
DISTRICT OF PUERTO RICO

In re:

**THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,**

as representative
of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors ¹

PROMESA

Title III

No. 17 BK 3283-LTS

Re: ECF No. 21738

(Jointly Administered)

**ORDER GRANTING URGENT CONSENSUAL
MOTION FOR EXTENSION OF DEADLINES**

Upon the *Urgent Consensual Motion For Extension Of Deadline To Reply To Debtor's Objection To Claim And To Reschedule Hearing Date* (the "Urgent Motion"); and the Court having found it has subject matter jurisdiction over this matter pursuant to PROMESA section 306; and venue in this district is proper pursuant to PROMESA section 307; and the Court having found that the relief requested in the Urgent Motion

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in the best interests of the Commonwealth and the creditor; and the Court having found that the Debtor provided adequate and appropriate notice of the Urgent Motion under the circumstances and that no other or further notice is required; and the Court having reviewed the Urgent Motion; and the Court having determined that the factual bases set forth in the Urgent Motion for Extension establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefore, it is **HEREBY ORDERED THAT:**

1. The Urgent Motion is granted as set forth herein.
2. The deadline to respond to the Objection to claim Motion shall be extended to October 5, 2022.
3. The deadline for Movants to file a reply to an opposition, if any, shall be extended to October 20, 2022.
4. The hearing date is scheduled for December 14, 2022 at 9:30AM (Atlantic Standard Time)

Dated: _____, 2022

HONORABLE LAURA TAYLOR SWAIN
UNITED STATES DISTRICT JUDGE